



The Court granted defendant's motion for an extension in its memorandum endorsement at Dkt. 22. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 21.

SO ORDERED.

Arun Subramanian, U.S.D.J.

Date: June 24, 2025

June 5, 2025

The Honorable Judge Arun Subramanian
United States District Court Judge
VIA ECF

Re: *Rosa Garo v. Tenaglia & Hunt, P.A.* , 24-cv-9812
Opposition to Defendant's Letter Motion for an Extension of Discovery Deadlines

Dear Judge Subramanian:

The Defendant in this action filed an application on June 4, 2025, requesting to extend all existing discovery deadlines by forty-five days. Although the Court's Individual Rules do not contemplate a response, the Court's Rules do require that any such application include "the reasons given by the adversary for refusing to consent." As Defendant did not include Plaintiff's reasons in its application, Plaintiff respectfully writes to bring those reasons to the Court's attention so that the Court has all requested information to make a decision on the Defendant's application.

Defendant is seeking a 45-day extension of all discovery deadlines but has provided no reason or justification for the necessity of this extension. The current deadline for the end of discovery is still over seven weeks away. Additionally, Defendant has not proposed any new deadlines by which it will provide supplemental responses to Plaintiff's discovery requests, served on April 11, 2025. Plaintiff informed Defendant that she could not consent to a 45-day extension without being given any reason for the lengthy delay and without any kind of schedule for production.

In a meet and confer on May 22, 2025, the parties mutually agreed to an extension for Defendant to supplement its interrogatory responses and discovery production by May 28, 2025, and June 4, 2025, respectively. Plaintiff then consented to an additional one-week extension and asked that if Defendant needed a further extension, Defendant provide Plaintiff with a list of the specific discovery requests that it needed more time to comply with, proposed dates for compliance, and a justification for the extension requested.

Defendant's counsel did not respond to Plaintiff's last email offering an extension, but instead filed the instant application to the court.

Demand Justice.

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Plaintiff's counsel would also like to correct Defendant's statement that the parties have been engaging in a back and forth conversation to narrow discovery disputes. There has been no such discussion. The meet and confer allowed the parties to discuss deficiencies in Defendant's responses identified by Plaintiff, and Defendant agreed to supplement its responses.

Respectfully submitted,

/s/
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